

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF MISSOURI

In Re:)
)
Mary Crooks,)
) Case No. 05-71032
)
)
Debtor,) Chapter 13
)

**DEBTOR'S MOTION TO CONVERT CHAPTER 13 CASE TO
CHAPTER 7 PURSUANT TO 11 U.S.C. SECTION 1307**

Comes now the Debtor, Mary Crooks, by and through her attorney of record, Jason C. Amerine, and for her Motion to Convert from Chapter 13 Case to Chapter 7 Pursuant to 11 U.S.C. Section 1307, state as follows:

1. That on or about, October 15, 2005, Debtor filed a petition for relief Under 11 U.S.C., Chapter 13.
2. That Debtor requests to convert her Chapter 13 case to a Chapter 7.

WHEREFORE, Debtor prays this Court enters an Order granting her Motion to Convert Chapter 13 case to Chapter 7 Pursuant to 11 U.S.C. 1307; and for such other and further relief this Court deems reasonable and necessary.

RESPECTFULLY SUBMITTED

CASTLE LAW OFFICES OF KANSAS CITY

By: /s/Jason C. Amerine
Jason C. Amerine, #50857
Attorney for Debtor
818 Grand Blvd., Ste. 700
Kansas City, MO 64106
(816) 842-6200
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NOTICE OF OBJECTION DEADLINE

NOTICE IS HEREBY GIVEN that within 20 days from the date of service of this notice, creditors may file objections as to why the Motion should not be granted with the **U.S. Bankruptcy Court, 400 East 9th Street, Kansas City, Missouri 64106, and serve a copy on debtor's counsel.** If objections are timely filed, the Court will rule on the matter from the pleading or set the objections for a hearing, if appropriate. If no objections are filed, the Court will enter its order without further notice.

CERTIFICATE OF SERVICE

The undersigned hereby states that a true copy of the foregoing Motion to Convert Case from Chapter 13 to Chapter 7 was mailed via first class mail, postage pre-paid, or mailed via electronic filing system to the party listed below and the attached Matrix, on this 14th day of February 2006.

/s/Jason C. Amerine
Jason C. Amerine #50857

Mr. Richard V. Fink
Chapter 13 Trustee
818 Grand Blvd., Ste 800
Kansas City, MO 64106

Arrow Financial
8589 Aero Dr., Suite 600
San Diego CA 92123

Bank One
PO Box 94015
Palatine IL 60094-4015

CAC Financial
2601 NW Expressway
Suite 1000 E
Oklahoma City OK 73112-7236

Capital One
PO Box 26030
Richmond VA 23260

Cass Medical Center
1800 E. Mechanic
Harrisonville MO 64701

Centrix
PO Box 17669
Denver CO 80217-0669

Cross Country Bank
PO Box 10004
Huntington WV 25770-0004

Dept Recovery
PO Box 9001
Westbury NY 11590

Direct Loans
PO Box 530260
Atlanta GA 30353-0260

IRS
P.O .box 970011
Saint Louis MO 63197

Kansas Counselors
PO Box 14765
Shawnee Mission KS 66215

Midland Credit Management
5775 Roscoe Court
San Diego CA 92123

Private Investors
3003 E Chestnut Expressway
Suite 100
Springfield MO 65802

Research Hospital
2316 Myer Blvd
Kansas City MO 64132

Southfork
1301 N. Scott Ave.
Belton MO 64012-4515

Southwestern Bell
841 E. Hunting Path Ave
Philadelphia PA 19124

Sprint
P.O. Box 219554
Kansas City MO 64121-9554

St. Joseph Medical Center
1000 Carondelet Drive
Kansas City MO 64114

T-Mobile
Financial Service Dept\Bankruptcy
P.O. Box 37380
Albuquerque NM 87176

Truman Hospital
2301 Holmes
Kansas City MO 64108-2634

UMB Bank
906 Grand Blvd
Kansas City MO 64141